

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**Philip Wilkinson and Pam Reed,
individually and on behalf of a class or
classes of all others similarly situated,**

Plaintiffs,

V.

**BDO USA, LLP, BDO International Ltd.,
BDO Global Coordination B.V., and
Brussels Worldwide Services BVBA,**

Defendants.

§ 100.00

CIVIL ACTION NO.
3:11-cv-01115-N

MOTION TO WITHDRAW

Pursuant to Local Rule 83.12, Plaintiffs Philip Wilkinson and Pam Reed, individually and on behalf of a class or classes of all others similarly situated, file this motion for Nicholas A. Foley to withdraw as counsel for the Plaintiffs. Mr. Foley is an attorney, formerly with the law firm of Neligan Foley LLP (“Neligan”) and has represented the Plaintiffs in connection with his employment at Neligan. Mr. Foley has retired from the practice of law effective August 31, 2014. Thus, the Plaintiffs request that this Court enter an order removing Mr. Foley as counsel of record for the Plaintiffs effective as of the same date.

The other attorneys at Neligan Foley LLP, along with attorneys at Castillo Snyder, P.C., Strasburger & Price, LLP, Butzel & Long PC, and Baker Botts LLP, who have made appearances in this case, will continue representing the Plaintiffs. Accordingly, Mr. Foley's withdrawal from the case will not cause undue delay or prejudice to any party.

Dated: October 1, 2014

Respectfully submitted,

NELIGAN FOLEY LLP

By: /s/ Douglas J. Buncher

Douglas J. Buncher

Texas State Bar No. 03342700

dbuncher@neliganlaw.com

325 N. St. Paul, Suite 3600

Dallas, TX 75201

Telephone: (214) 840-5300

Telecopier: (214) 840-5301

CASTILLO SNYDER, P.C.

Edward C. Snyder

Texas Bar No. 00791699

esnyder@casnlaw.com

Jesse R. Castillo

jcastillo@casnlaw.com

300 Convent Street, Suite 1020

San Antonio, Texas 78205

Telephone: (210) 630-4200

Telecopier: (210) 630-4210

BUTZEL LONG PC

Peter D. Morgenstern

(admitted pro hac vice)

morgenstern@butzel.com

380 Madison Ave,

22nd Floor

New York, NY 10017

(212) 818-1110

(212) 818-0494 (Facsimile)

STRASBURGER & PRICE

Edward F Valdespino

edward.valdespino@strasburger.com 300

Convent St

Suite 900

San Antonio, TX 78205

210/250-6000

Fax: 210/250-6100

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

Counsel for the Plaintiff has attempted to confer with counsel for Defendants, via email at the email address(es) reflected on the Court's docket, on September 24, 2014, allowing sufficient time for a response and have received no response or objection to the granting of the relief requested herein.

/s/ Douglas Dunn

Douglas Dunn

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system pursuant to the Court's Local Rules this 1st day of October, 2014. All other counsel will be served by United States mail, certified mail/return receipt requested.

/s/ Douglas Dunn

Douglas Dunn